

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

LEE WILLIAMS, *individually and in  
his representative capacity,*

Plaintiff,

-against-

TECH MAHINDRA (AMERICAS),  
INC.,

Defendant.

CIVIL ACTION NO.:  
3:20-CV-04684

**NOTICE OF MOTION TO  
DISMISS**

**ORAL ARGUMENT REQUESTED**

PLEASE TAKE NOTICE that Defendant Tech Mahindra (Americas), Inc. (“TMA”) will move before the Honorable Brian Martinotti, U.S.D.J., at the U.S. Clarkson S. Fisher Building and U.S. Courthouse, 402 East State Street, Trenton, New Jersey, on July 6, 2020 at 10:00 a.m., or as soon thereafter as counsel may be heard, for an order dismissing Plaintiff Lee Williams’s individual and putative class claim of race and national origin discrimination under Section 1981 for failure to state a claim pursuant to Fed. R. Civ. P. 12(b)(6), for lack of subject-matter jurisdiction pursuant to Fed. R. Civ. P. 12(b)(1), and as time-barred without leave to replead since doing so would be futile.

In support of this motion, TMA will rely on the attached memorandum of law dated June 9, 2020. A proposed form of Order is submitted herewith.

Oral argument is respectfully requested in connection with this motion.

Dated: New York, New York  
June 9, 2020

Respectfully submitted,  
PAUL HASTINGS LLP

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TECH MAHINDRA (AMERICAS),  
INC.

\*pending admission *pro hac vice*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 9, 2020, a copy of the foregoing Defendant's Notice of Motion to Dismiss and all supporting documents were filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

  
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Brian M. Hayes